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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Administration of the North American) CC Docket No. 92-237
Numbering Plan,)
Carrier Identification Codes (CCS))

REPLY COMMENTS OF MCI TELECOMMUNICATIONS CORPORATION

MCI Telecommunications Corporation (MCI), by counsel, pursuant to
47 C.F.R. § 1.106, hereby submits these reply comments on the Petition For Clarification
(Petition) filed by BellSouth Corporation (BellSouth) on November 23, 1997.

Four parties, including MCI, commented on BellSouth's Petition.¹ Issues highlighted in
each party's comments raise the question whether an orderly transition from 3-digit to 4-digit
carrier identification code (CIC) dialing is possible at all within the time frame ordered by the
Federal Communications Commission (Commission).² The issues raised by BellSouth's Petition
and the comments thereon concern a significant and rapidly approaching change to the nation's
current dialing plan. In order to smoothly implement this nationwide change, it is critical that the
Commission take note of the fact that comments filed in this proceeding signal the existence of

¹In addition to MCI, the commenting parties are U S WEST, AT&T Corp. and the SBC
Companies (collectively referring to Southwestern Bell Telephone Company, Pacific Bell and
Nevada Bell).

²See Administration of the North American Numbering Plan Carrier Identification Codes
(CICs), CC Docket No. 92-237, Order on Reconsideration, Order on Application For Review,
and Second Further Notice of Proposed Rulemaking and Order (rel. Oct. 22, 1997)
(Reconsideration Order).

disagreement and uncertainty about how the changes will take place, and thus, necessitate an extension of the permissive dialing period.

The uncertainties and unexpected events highlighted in the record of this proceeding, along with other recent industry occurrences, will continue to adversely impact the public and the industry as a whole as this dialing plan change continues to unfold. As a result, MCI strongly urges the Commission to consider the extension of the permissive dialing period.

MCI's comments supporting BellSouth's Petition were conditioned on the public disclosure by BellSouth of pre-implementation and quality control plans at least 30 days in advance of the date upon which a LEC intends to reconfigure an end office.³ Disclosure of these plans is necessary to the smooth implementation of the transition process. U S West, Inc. (U S WEST), states cavalierly in its comments that MCI's request for disclosure of pre-implementation plans is unnecessary,⁴ but fails to offer any support for its conclusion. As stated above, MCI's needs to know ahead of time how each local exchange carrier (LEC) plans to transition its end offices in order to conduct its own network planning, and in order to properly educate consumers about what to expect as the transition unfolds. MCI's request for implementation plans is not so novel, and the Commission has ordered such plans in other contexts. For example, "[i]n order to facilitate the orderly implementation of toll dialing parity,"

³Comments of MCI, pp. 3-5.

⁴Comments of U S WEST, p. 4.

the Commission required that dialing parity implementation plans be filed, disclosing the methods and plans proposed by each LEC to implement dialing parity.⁵

In its comments, U S WEST states that like BellSouth, it is unable to block 3-digit CCS in its switches on a "flash-cut" basis.⁶ U S WEST, however, asserts that the Reconsideration Order extending the permissive dialing period need not be clarified in order for U S WEST and any other similarly situated carrier to phase-in 3-digit CIC blocking beginning July 1, 1998.⁷ U S WEST also asserts that because the 'truth' of the education campaigns undertaken by carriers will "prove itself in,"⁸ phased blocking of 3-digit CCS is "of little regulatory, market or industry consequence,"⁹ and that carriers would not be disadvantaged by a phase-in process.¹⁰

U S WEST is incorrect. Without pre-implementation and quality control plans, U S WEST, BellSouth and other similarly situated LECs could simply transition end offices at their leisure, without notifying MCI of dates and transition times, and without disclosing important details of the transition. This would leave MCI without the ability to plan for the transition

⁵*In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, Second Report and order and Memorandum Opinion and Order (rel. August 8, 1996), ¶ 6. Although these rules were overturned in part, *Public Utilities Comm'n of California, et. al. v. FCC*, 124 F.3d 934 (1997), they remain in effect insofar as they concern interstate, intraLATA toll traffic. *Id.* at 943 n.6 ("[o]ur decision to vacate the [FCC's dialing parity] rules does not apply to the extent that [they] govern the very small percentage of intraLATA, toll, interstate telecommunications."

⁶Comments of U S WEST, p. 2.

⁷*Id.*

⁸*Id.*, p. 3.

⁹*Id.*

¹⁰*Id.*, p.5.

within its own network, and would cause substantial disruption to MCI's educational efforts throughout the country. Thus, U S WEST's assertion that LECs need not publicly disclose implementation plans is without merit.

AT&T opposes BellSouth's Petition, and asserts that if BellSouth needs two months to phase-in 3-digit CIC blocking, it should be required to do so beginning May 1, a full two months before the currently scheduled end to the permissive dialing period.¹¹ Thus, AT&T's position is that even if it is impossible for a LEC to flash-cut 3-digit CIC blocking, a LEC that needs to phase implementation should be allowed to cut into the permissive dialing period, and begin refusing to accept correctly dialed calls using 3-digit CCS prior to the end of the permissive dialing period, June 30, 1998. If the Commission were to accept AT&T's position, each carrier that needed to phase implementation would be in violation of the Reconsideration Order once it blocked a 3-digit CIC call before June 30, 1998. AT&T's position is thus unacceptable.

The harm to carriers such as MCI cannot be underestimated if AT&T's position is adopted. The Commission has already recognized that carriers need at least until June 30 to educate consumers and otherwise prepare for the end to the permissive dialing period.¹² If, in addition to educating consumers, attempting to reach agreement with respect to an appropriate intercept message and taking steps to account for consumers served by LECs for whom the Commission has extended the period of time in which they must accept 4-digit CCS,¹³ MCI must

¹¹See Opposition of AT&T Corp., p. 3.

¹²Reconsideration Order, ¶ 20.

¹³See *infra*, note 18 and accompanying text.

also deal with staggered 3-digit CIC blocking by LECs (with or without implementation plans), the entire transition process will quickly become chaotic and unmanageable.

AT&T correctly points out that the Commission's intent in its Reconsideration Order was to "put all carriers at parity by requiring identical dialing patterns."¹⁴ AT&T's position, however, is that in the face of the possibility that nationwide dialing parity may not be possible, the Commission should do nothing. If it is true, as asserted by U S WEST and BellSouth, that flash-cut blocking of 3-digit CCS is impossible, dialing parity vis-a-vis all carriers is also impossible. Per the Commission's Reconsideration Order, MCI will advise the public that 3-digit CCS will be accepted nationwide until June 30.¹⁵ Adoption of AT&T's approach to allow individual carriers to begin blocking 3-digit CIC calls whenever and wherever they feel it is appropriate, within the permissive dialing period, would cause irreparable harm to MCI, confuse the public and violate the Commission's Reconsideration Order.

SBC Companies claim to have similar issues as BellSouth with respect to implementation of this dialing change.¹⁶ Like BellSouth, SBC Companies claim that an unspecified period of time is needed to convert each switch in their networks to block 3-digit CCS.¹⁷ As a result, SBC Companies support BellSouth's Petition, on the condition that blocking can begin only after June

¹⁴AT&T Comments, p. 4.

¹⁵MCI does not doubt that it would be unfairly blamed if, following the Commission's Reconsideration Order, it tells consumers that 3-digit CCS will be accepted until June 30, and a LEC begins blocking 3-digit CCS before that date.

¹⁶Comments of SBC Companies, p. 2.

¹⁷*Id.*

30, the end of the permissive dialing period.¹⁸ Thus, yet another carrier has a different set of circumstances and a different position about how this transition should occur.

In addition to the transitional challenges highlighted by the comments filed in response to BellSouth's Petition, several other occurrences point out the need for more time to successfully implement the transition in a fashion that furthers the public interest. First, the Commission has recently granted several LECs' requests to extend beyond January 1, 1998, the date by which those LECs must be able to accept 4-digit CCS.¹⁹ Those extensions affect thousands of access lines throughout the country, and serve to extend the January 1, 1998, transition date to several different dates, from April 1998 to January 1999. The Commission's granting of those extension has created a patchwork of different transition dates throughout the country, and thus further complicates the logistics associated with the transition from 3-digit to 4-digit CIC dialing.

¹⁸*Id.*

¹⁹*See, e.g.,* Order, Petitions For Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule, NSD File Nos. 97-53, 97-56, 97-46, 97-51, 97-54, 97-55, 97-47, 97-48, 97-49, 97-50 (rel. Dec. 3, 1997), ¶¶ 15-30 (granting extensions of time for several LECs to accept 4-digit CCS, and further, indicating that it would consider future requests for extension of time); Order, Petitions For Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule, NSD File Nos. 97-52, 97-58, 97-57, 97-62, 97-61 (rel. December 15, 1997), ¶ 24 (Hager Order) (granting extensions of time until August 31, 1998 (Silver Star Telephone Co., Inc.) and January 1, 1999 (Hager Telecom Co.), and ordering that both LECs install an intercept message advising callers that they "will not be able to reach their long distance carriers through access code dialing until January 1, 1999"). *See also* Order, Petitions For Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule, NSD File Nos. 97-74, 97-63, 97-78, 97-75, 97-66, 97-67, 97-65, 97-68, 97-73, 97-70, 97-72, 97-76, 97-64, 97-71, 97-69 (rel. December 24, 1997) (granting several petitions for extensions of time).

In one particularly troubling instance, for example, the Commission granted Hager Telecom, Inc.'s (Hager's), petition for an extension of time until January 1, 1999. In so doing, the Commission ordered Hager to:

on June 30, 1998, indicate that callers will not be able to reach their long distance carriers through access code dialing until January 1, 1999.²⁰

The fact that so many LECs throughout the nation will be implementing this transition in an unpredictable and non-uniform fashion is reason enough to extend the permissive dialing period. The above additional Commission order that Hager's customers be told that they simply cannot reach the carrier of their choice until January 1999 not only adversely impacts the ability of the industry to make a smooth transition to nationwide 4-digit dialing, but also directly violates the Commission's Reconsideration Order wherein all LECs were instructed to "offer a standard intercept message beginning on or before June 30, 1998,"²¹

Rather than continue along the path of this patchwork of changes and transitional details, MCI strongly suggests that the better option is to extend the permissive dialing period until at least January 1, 1999. That way, all LECs will have completed the necessary upgrades to accept 4-digit CCS and the public interest will be better served through promotion of a smoother transition to the new national dialing plan. Additionally, an extension will minimize consumer confusion, frustration and inconvenience and ensure that the transition occurs in a competitively neutral fashion.

²⁰Hager Order, ¶ 24.

²¹*Id.*

Another hurdle that must be overcome as this transition unfolds is the Commission's requirement in the Reconsideration Order that carriers agree to an appropriate intercept message.²² Although the Network Interconnection Interoperability Forum (NIIF) has met on two separate occasions to discuss this issue, it has yet to finalize language. The issue will next be considered on February 11 and 12, 1998, at the NIIF general session. If agreement is not reached by then, the issue may return to the committee for reconsideration at the next scheduled meeting in March. Of course, it is altogether possible that NIIF will be unable to reach an industry consensus in any event, thus requiring even more resources and time to implement this transition. In addition to the specific language that will be employed in the intercept message, another outstanding issue on which the industry has not reached any agreement is the length of time the announcement must be played. These are significant issues, and MCI estimates that even after agreement is reached, it will take various amounts of time, from days to months depending on the carrier, to place the announcement in all required switches, and implement all other steps necessary to coordinate the orderly provision of the intercept message to the public.

Yet another challenge to this transition is revealed by Ameritech's and Bell Atlantic's filings at the Commission of Network Change Notifications affecting this transition.²³ In its notification, Bell Atlantic indicates it will end permissive dialing on June 30, and require 4-digit CCS beginning July 1. Ameritech's notification states it will end permissive dialing on June 29, and require 4-digit CCS beginning June 30. Notwithstanding that the Commission's

²²Reconsideration Order, ¶ 26.

²³See Network Change Notification of Ameritech, Report No. NCD-114, filed January 9; Network Change Notification of Bell Atlantic, Report No. NCD-113, filed January 9, 1998.

Reconsideration Order clearly implements an end to the permissive dialing period on June 30, and not before, Ameritech's notification indicates it will end permissive dialing on June 29. Though Ameritech's notification can be corrected, it further exemplifies the types of unexpected details that will continue to arise as the industry makes this transition.

WHEREFORE, for the foregoing reasons, although MCI repeats its request that the Commission grant BellSouth's Petition only if it also requires that BellSouth and other similarly situated LECs publicly disclose their pre-implementation and quality control plans, MCI also requests that the Commission extend the period during which 3- and 4-digit CCS may be used to complete calls in order to ensure a smooth and orderly transition process with respect to this national dialing plan change.

Respectfully submitted,

MCI TELECOMMUNICATIONS
CORPORATION

A handwritten signature in dark ink, appearing to read "Donna M. Roberts", is written over a horizontal line.

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Dated: January 13, 1998

CERTIFICATE OF SERVICE

I, John E. Ferguson III, do hereby certify that copies of the foregoing Reply Comments of MCI on the Matter of the Administration of the North American Numbering Plan Carrier Identification Codes (CICs) were sent, on this 13th day of January, 1998, via first-class mail, postage pre-paid, to the following:

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In the Matter of)
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Administration of the) CC Docket No. 92-237
North American Numbering Plan)
Carrier Identification Codes (CICs))
)

REPLY

BellSouth Corporation, by counsel, pursuant to 47 C.F.R. §§ 1.4(h), 1.4(j) and 1.429(g), files its reply to the comments and opposition filed on or before December 29, 1997 in response to BellSouth's Petition for Clarification that local exchange carriers (LECs) may, consistent with the orders issued in this proceeding, implement phased blocking of 3-digit carrier identification codes (CICs) beginning July 1, 1998.

I. THE COMMISSION INTENDED THAT THE PERMISSIVE DIALING PERIOD EXTEND FOR A FULL SIX MONTHS UNTIL JUNE 30, 1998.

Each party commenting on the issue agrees that it was the Commission's intent that the transition period during which 3- or 4-digit CICs may be utilized be extended a full six months, up to and including June 30, 1998. *Comments of the Telecommunications Resellers Association to Petitions for Clarification and Reconsideration*, n.2 (expressing no view on the assertion that blocking 3-digit CICs will require a two month implementation period); *Comments of MCI Telecommunications Corporation in Support of BellSouth's Petition for Clarification*, p. 3 (the Commission extended the period during which 3- and 4-digit CICs may be used until June 30, 1998, and LECs must continue to accept 3-digit CICs until that time); *Opposition of AT&T Corp.*, pp. 1-2 (the transition period during which both three-digit and four digit CICs would be

recognized will end on June 30, 1998); *Comments of SBC Companies*, p. 2; *Comments of U S WEST, INC.*, pp. 1-2.

II. THERE IS A NEED FOR CLARIFICATION THAT LECS MAY BEGIN BLOCKING 3-DIGIT CICs ON JULY 1, 1998.

BellSouth would like to agree with U S WEST that a clarification of the Commission's *CIC Reconsideration Order*¹ is not necessary to allow for the phased implementation process described by BellSouth in its Petition. *U S WEST Comments* at 2. Unfortunately, quoting the same provisions of the *CIC Reconsideration Order* as U S WEST, AT&T opposes BellSouth's petition on the grounds that no three-digit CIC call may complete after June 30, 1998 without violating the Commission's orders. *AT&T Opposition* at 2-3. Thus, BellSouth urges the Commission to clarify in plain language that a LEC's phased implementation of 3-digit CIC blocking beginning July 1, 1998 is the only practicable way of accommodating the additional six-month permissive dialing period and is therefore consistent with the *CIC Reconsideration Order*.

AT&T asserts that "if BellSouth needs two months to fully comply with the June 30 cutover date, then it should commence its efforts May 1." *AT&T Opposition* at 3. As MCI already demonstrated in comments filed on December 4, 1997 in support of BellSouth's petition, such an interpretation would force BellSouth and other LECs to begin "blocking 3-digit CICs prior to June 30 in violation of the Commission's Reconsideration Order:"

This will result in thousands of consumers being denied the benefits of using 3-digit CICs for two months, thus rendering meaningless the Commission's

¹ Administration of the North American Numbering Plan Carrier Identification Codes (CICs), CC Docket No. 92-237, *Order on Reconsideration, Order on Application for Review, And Second Further Notice of Proposed Rulemaking and Order* (October 22, 1997) ("*CIC Reconsideration Order*").

extension for this two month period. Additionally, IXC's such as MCI would be denied the full promise of the additional time ordered by the Commission to reconfigure their networks and notify their customers of the new dialing pattern.

If BellSouth is not allowed to phase implementation beginning on July 1, the effect will be partial nullification of the extended transition period for thousands of consumers and IXC's in BellSouth's territory.

MCI Comments at 3. As U S WEST explains, the phased-in blocking of three-digit CICs is of little regulatory, market, or industry consequence, because by "July 1, 1998, individuals will be dialing four-digit CICs because they will have been previously advised that such dialing would be required after June 30, 1998." *U S WEST Comments* at 2-3.²

AT&T offers no legal, economic, or policy justification for its literalistic interpretation of the Commission's extended requirements that would result in piecemeal erosion of the Commission's extended permissive dialing period, other than a suggestion that to do so would "lessen any negative effects of the disparity that may arise during the transition." *AT&T Opposition* at 3-4. However, the Commission in its *Second Report and Order* already determined that the seven-digit/five-digit CAC dialing disparity that will occur during transition does not violate the Communications Act's prohibitions against unreasonable practices or unreasonable discrimination, nor does it violate the dialing parity provision of the Telecommunications Act of 1996, which "simply does not reach the issue of access codes of different lengths."³ The Commission further found that a "flash-cut conversion to four digit

² Although BellSouth agrees that, based on uniform customer notification efforts, the vast majority of callers will be using 4-digit CICs, it is reasonable to expect some inadvertent 3-digit CIC dialing to occur after the end of the permissive dialing period. Within two months, however, all 3-digit CIC calls will be blocked.

³ Administration of the North American Numbering Plan Carrier Identification Codes (CICs), CC Docket No. 92-237, *Second Report and Order* 12 FCC Rcd 8024, 8045 (April 11, 1997) at ¶ 34.

CICs would be contrary to the public interest.” *Second Report and Order*, ¶¶ 32, 34; see *TRA Comments* at 5-6. There is simply no record of any “negative effects” to “lessen,” and even if there were, they would certainly be outweighed by the confusion that would result if the permissive dialing period were to end prematurely on a haphazard, arbitrary, and piecemeal basis. *MCI Comments* at 3.

The Commission stated unequivocally its decision to end the transition to 4-digit CICs “as soon as practicable.” *Second Report and Order*, ¶¶ 32, 33. Requiring phased blocking of 3-digit CICs before the end of the permissive dialing/transition period is simply not practicable. It will end permissive dialing prematurely in scattered parts of the country. It will cause havoc with orderly customer notification efforts and create confusion among the dialing public by causing a patchwork of switch-specific mandatory 4-digit CIC dialing dates throughout the country. Having advanced no good reason as to why such a result would be in the public interest, and in light of the earlier filed comments to the contrary of MCI which AT&T chose not to address, let alone refute, one wonders whether AT&T has filed simply for the sake of opposing a Bell operating company’s petition for clarification, however salutary that petition might be. The record is clear that the only “practicable way” to accommodate the full six month permissive dialing period is to permit phased blocking of 3-digit CICs beginning July 1, 1998. *Comments of MCI, SBC,* and *U S WEST, passim*.

III. THE COMMISSION SHOULD GRANT BELLSOUTH’S PETITION UNCONDITIONALLY.

Although MCI advances sound policy reasons favoring the Commission’s grant of BellSouth’s request for clarification, it also requests that the Commission condition any such

clarification on the establishment of numerous unnecessary new and burdensome disclosure requirements. *MCI Comments* at 4-5. MCI filed its comments early on December 4, 1997, and that same day served every participant in this docket with a copy of its proposal, including IXCs, their trade associations, and counsel. Despite having at least three weeks to consider MCI's proposal, no party filed comments on December 29 supporting this extra-regulatory requirement or independently suggesting a similar requirement. This may very well be because, as U S WEST explains, MCI presents no compelling evidence to support its requested mandate. *U S WEST Comments* at 4.

MCI states that industry coordination efforts are already underway, and "industry participants meet regularly to discuss the many details associated with accomplishing a smooth and orderly transition to 4-digit CIC dialing, with as little customer confusion as possible." *MCI Comments* at 4. MCI offers no evidence as to why this process, along with the Commission's customer notification requirements and the scheduled end of the permissive dialing period on June 30, 1998, needs to be supplemented by a series of internal LEC engineering disclosures. Although MCI states that the disclosures would "encourage the coordinated conversion from 3- to 4-digit dialing that is contemplated by the Commission's CIC Reconsideration Order." *MCI Comments* at 5, such coordinated conversion is, by MCI's own admission, already taking place on a regular basis within the industry.

Moreover, by June 30, 1998, MCI and all other interexchange carriers (IXCs) making commercial use of CIC codes are required to notify their customers that only 4-digit CICs may be dialed. Thus, the information MCI seeks would be of no value to IXCs because their customers are not supposed to dial 3-digit CICs after June 30, and IXCs will most certainly not

be promoting or advocating the use of 3-digit CICs after that date. In any event, the completion of inadvertently dialed 3-digit CICs after June 30 will be arbitrary, limited and temporary until 3-digit blocking is fully implemented on a phased schedule in all switches.

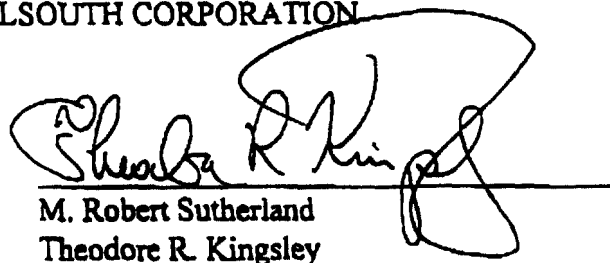
CONCLUSION

AT&T presents no reason to shorten the permissive dialing period on an arbitrary, ad hoc basis in order to accommodate engineering requirements of phased 3-digit CIC blocking in LEC end offices. MCI presents no reason to burden LECs with unnecessary post-permissive dialing period disclosure requirements. There is unanimous support in the record that the Commission intended a full six month extended permissive dialing period, and the phased blocking of 3-digit CICs by LECs beginning July 1, 1998, is the only practicable method of assuring carriers and their customers the full use of the transition period.

Respectfully submitted,

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DATE: January 13, 1998

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I do hereby certify that I have this 13th day of January, 1998, served all parties to this action with a copy of the foregoing **REPLY** by placing a true and correct copy of same in the United States Mail, postage prepaid, addressed to the parties listed on the attached service list.

Dorise W. Jewell

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JAN - 8 1998

FEDERAL COMMUNICATIONS COMMISSION -
OFFICE OF THE SECRETARY

In the Matter of)
)
Administration of the)
North American Numbering Plan)
Carrier Identification Codes (CICs))

CC Docket No. 92-237

REPLY COMMENTS OF VARTEC TELECOM, INC.

VarTec Telecom, Inc. ("VarTec") now files these comments in reply to the comments and oppositions filed by the Telecommunications Resellers Association ("TRA"), Southwestern Bell Telephone Company, Pacific Bell and Nevada Bell (the "SBC Companies"), AT&T Corp. ("AT&T") and U S West, Inc. ("U S West").

VarTec concurs with the comments recently filed by TRA regarding the Petition for Reconsideration filed by America One Communications, Inc. ("America One") of the Federal Communications Commission's ("Commission") Order on Reconsideration ("Reconsideration Order") in the above-referenced docket. Specifically, VarTec agrees with TRA's motion for the Commission to deny America One's Petition for Reconsideration as the two step transition period is required in order to provide the time necessary for local exchange carriers ("LECs") to make equipment modifications as well as the minimum time required for interexchange carriers ("IXCs") to educate consumers about the code expansion and also modify equipment. In fact, the numerous waivers granted by the Commission provide compelling evidence that the industry requires longer than June 30, 1998 in order to complete all of the equipment modification needed for the four-digit CIC conversion.

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In addition, VarTec supports the SBC Companies' comments regarding BellSouth Corporation's ("BellSouth's") Petition for Clarification in this docket. It is the SBC Companies' position that BellSouth as well as the SBC Companies should be permitted to begin their programming efforts to block three-digit CICs after the four-digit CIC implementation deadline for DXCs, which is presently June 30, 1998. VarTec agrees that all consumers should be able to utilize a three-digit CIC through the end of the transition period for DXCs and that no LEC should be allowed to eliminate the use of a three-digit CIC prior to this deadline. Further, VarTec concurs with U S West's recent comments which state that U S West supports BellSouth's Petition for Clarification, and VarTec agrees that any clarification issued by the Commission be applicable to all involved LECs.

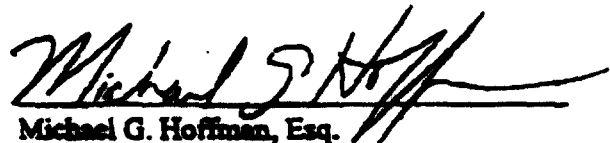
Finally, VarTec does not agree with AT&T's opposition to BellSouth's Petition for Clarification. BellSouth as well as other LECs listed herein have indicated a strong desire to adhere to the Commission's instruction on when to proceed in blocking consumers' ability to utilize a three-digit CIC. The LECs require approximately sixty days to completely eliminate the programming which allows for the use of three-digit CICs. VarTec opposes AT&T's position that BellSouth's Petition for Clarification be denied and agrees that BellSouth should be permitted to begin the phase out of the three-digit CICs after the end of the transition period to comply with the Commission's intent in implementing a two step transition period. In addition to the above-stated objections, VarTec also disagrees with AT&T's position that the Commission should not consider extending the transition beyond the June 30, 1998 deadline for expanding CICs to four digits. VarTec certainly supports extending the transition period in order to more thoroughly educate consumers and modify equipment.

In summary, VarTec supports those comments filed in this docket which specifically address concerns that would benefit the best interest of consumers while facilitating a smooth transition into the use of four-digit CICs for the LECs and IXCs required to make equipment modifications..

Respectfully submitted,

VARTEC TELECOM, INC.

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January 8, 1997

Page 3